

**UNITED STATES COURT OF APPEALS  
DISTRICT OF COLUMBIA CIRCUIT**

NATIONAL SECURITY  
COUNSELORS, INC.,

Appellant,

v.

CENTRAL INTELLIGENCE  
AGENCY, *et al.*,

Appellees.

Case No. 14-5171

\* \* \* \* \*

**APPELLANT’S UNOPPOSED MOTION FOR ENLARGEMENT  
OF TIME TO FILE ITS CORRECTED REPLY BRIEF**

On 13 April 2015, Appellant National Security Counselors, Inc. (“NSC”) filed its Reply Brief along with a Motion for Leave to File Excess Words in Violation of Local Rule 32. On 7 July 2015, the Court denied NSC’s Motion and ordered NSC to file a Corrected Reply Brief by 14 July 2015. NSC now asks the Court for a ten-day extension of this deadline, until 24 July 2015. Appellees do not oppose this Motion.

NSC has good cause to request this relief. Bradley Moss, the primary author of this Reply Brief, was out of the country on vacation when the Court issued its 7 July 2015 Order and has only recently returned. His work schedule was already full for the following week due to the vacation, and he and his co-counsel Kel

McClanahan have not had sufficient time to collaborate and complete drafting a brief which complies with the Court's Order. As NSC previously advised the Court, creating a brief which meets the word limits will necessarily entail removing critical portions of arguments which render those arguments incomplete and/or unsupported, given Appellees' reliance on arguments not previously made before the District Court.<sup>1</sup> As a result, crafting a brief which comports with the word limits is more labor-intensive in this case than is usually the case, and so NSC asks for ten additional days to complete this work, in light of Mr. Moss' unavailability for much of last week.

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<sup>1</sup> For instance, had Appellees made the *alter ego* argument below, NSC would have incorporated its response to that argument in its Opening Brief, which, at only 8617 words, had more than enough room. Because Appellees only raised this argument for the first time in this appeal, NSC has to address it in full in this Reply Brief, which is normally only used to supplement arguments already made in the Opening Brief.

Date: July 13, 2015

Respectfully submitted,

/s/ Bradley P. Moss

/s/ Kelly B. McClanahan \_\_\_\_\_

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